

*Before the*  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20554**

In the Matter of

2014 Quadrennial Regulatory Review – Review	)	
of the Commission’s Broadcast Ownership Rules	)	
and Other Rules Adopted Pursuant to Section	)	MB Docket 14-50
202 of the Telecommunications Act of 1996	)	
	)	
2010 Quadrennial Regulatory Review – Review	)	
of the Commission’s Broadcast Ownership Rules	)	MB Docket 09-182
and Other Rules Adopted Pursuant to Section 202	)	
of the Telecommunications Act of 1996	)	
	)	
Promoting Diversification of Ownership	)	
In the Broadcasting Services	)	MB Docket 07-294
	)	
Rules and Policies Concerning	)	
Attribution of Joint Sales Agreements	)	
In Local Television Markets	)	MB Docket 04-256
Multiple Ownership Rule	)	

To: The Commission

**REPLY TO OPPOSITOIN TO MOTION FOR EXTENSION OF TIME**

Prometheus Radio Project and Media Mobilizing Project (“Movants”) respectfully submit this reply to the opposition to Movants’ motion for extension of time in this proceeding filed earlier today (January 5) by the National Association of Broadcasters (NAB).

Underneath the NAB’s overheated rhetoric is its unhappiness with the fact that it is dissatisfied with the Commission’s determination that the Commission’s broadcast rules need not be repealed or modified pursuant to the standard established in Section 202(h) of the Telecommunications Act of 1996. However, when the value of allowing interested parties adequate time to develop a complete record is balanced against the fact that grant of the extension will not delay action on the NAB petition, the special circumstances here justify grant of Movants’ motion.

There is no reason to be coy: every party to this proceeding and every Commission staff

member understands that the current Chair will resign as of January 20 and a new President will appoint a new Chair or Acting Chair immediately thereafter. If any work on the NAB's petition were begun prior to that date, it would be superceded by whatever directions may be provided by new management. As a practical matter, it will take some time - certainly weeks - before new lines of authority are clearly established and the staff receives new directions on this and all other pending proceedings. Thus, grant of the requested extension will not delay action on the NAB petition.

NAB correctly notes that the Federal Register notice does not provide it with the 10 days for reply as is contemplated by the Commission's rules. Movants do not object to allowing this time for reply, so if the Commission grants the motion for extension and establishes February 16 as the due dates for oppositions, the date for replies would be February 27.

Wherefore, Movants ask that the Commission extend the filing deadlines for oppositions and replies in this proceeding to February 17, and February 27, 2017, respectively, and grant all such other relief as may be just and proper.

Respectfully submitted,



Andrew Jay Schwartzman  
Institute for Public Representation  
Georgetown University Law Center  
600 New Jersey Avenue, NW  
Room 312  
Washington, DC 20001  
(202) 662-9535  
*Counsel for Movants*

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